

SUGGESTIONS FOR COMMENTING ON WPG'S PROPOSED 10-YEAR PERMIT
Bill Lockhart, board member Citizens' Committee to Save Our Canyons

The way to make comments more persuasive to a government agency is to clearly address them to the questions the agency must ask itself when considering an action that might affect the environment. These questions mainly revolve around a) whether the agency must analyze the impacts of a proposed action and document these in an environmental impact statement (EIS), and b) what the analysis in an EIS should include, if the agency decides it must prepare one.

The questions the Forest Service (FS) has before it in this case are:

1. Can we use a categorical exclusion? The FS wants to use a new Bush regulation, called a categorical exclusion (CE), that allows it to avoid doing an environmental impact statement (EIS). But the agency can't use the CE if a) impacts from WPG's operation are "significant" or b) impacts have increased significantly since the 1999 EIS, or will increase significantly before the end of the new 10-year permit (2020). So the number one thing anyone could say is to the effect of "based on the growth in BC use I have observed over the last _____ years, the 1999 EIS could not reflect the impacts occurring today, and there is no way that impacts will not increase dramatically before the end of the term of the proposed permit." Focus on noise and safety impacts, since, arguably competition for ski terrain is not an environmental effect, so not something the FS has to care much about. Remind the FS that it did not do any new analysis of impacts on other backcountry users in the 2004, so the most recent analysis of these impacts is already nine years old.

2. Should we prepare a new EIS? Urge them that the backcountry has continued to get more crowded so they need to take another look at noise and safety impacts because, with increased congestion in the BC, these impacts are significantly greater than they were during the 1999, or even 2004, EIS.

3. What should a new EIS analyze? Suggest what effects of WPG's operations you think the FS should consider before it decides whether to issue a permit to WPG or what limitations to impose on it. Examples: perform noise measurements/mapping, perform backcountry use measurements/mapping, require WPG to provide number of individuals served, determine presence of and effect on sensitive, threatened, or endangered species.

4. Should we continue to issue these permits to WPG, or tighten restrictions on it? Argue why heli-skiing is an inappropriate use of public lands, or appropriate only with certain operational restrictions, etc. On this point, regarding claims that WPG's operations are "elitist," keep in mind that the FS tends to see non-heli backcountry skiers/riders/snowshoers as just as elitist ("physically endowed" vs. "financially endowed"). Good points to make in favor of eliminating or restricting WPG are that the overall benefit of the permit to the public is disproportionate to the adverse effects, and that the adverse effects to the public are asymmetrical—experienced only by one group, non-motorized forest users.